

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA**

IN RE: RONALD NMN ANGEL

Debtor

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CHAPTER 13
CASE NO. 19-61946

ANSWER TO MOTION FOR RELIEF FROM STAY

The Debtor, by Counsel, files this Answer to object to lifting the stay based on the Motion filed by **REGIONAL ACCEPTANCE CORPORATION**, and requests that a hearing be scheduled on the Motion for Relief.

1. Debtor admits allegations contained in the paragraph(s) 1 through 7 of the Motion for Relief.
2. Debtor denies the allegations contained in Paragraph(s) 8, 9, 11, and 12.
3. Debtor is without sufficient information to either admit or deny the allegations in paragraph(s) 10; therefore said paragraph(s) 10 is/are denied and Debtor demands strict proof thereof.
4. In the event that the court may determine relief is warranted, Debtor requests that the Court should grant less drastic relief by conditioning or modifying the stay.
5. Movant has not shown the irreparable harm necessary to justify lifting the stay.

/s/ Janice Hansen
Janice Hansen, Counsel for Debtor
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(434) 845-2600

CERTIFICATION

I certify that on this 6th day of April, 2023, the following person(s) were or will be served a copy of this Answer to Motion for Relief via the CM/ECF system or by first class mail.

/s/ Janice Hansen
Janice Hansen, Counsel for Debtor

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